

1 The Hon. Lauren King
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 UNITED STATES DISTRICT COURT FOR THE
 WESTERN DISTRICT OF WASHINGTON
 AT SEATTLE
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11 UNITED STATES OF AMERICA,

12 NO. CR22-180-LK

13 Plaintiff,

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**STIPULATION AND
~~PROPOSED~~ ORDER SETTLING
 THIRD-PARTY CLAIM**

17 RYAN HOLMQUIST,

18 NOTE ON MOTION CALENDAR:
 June 12, 2025

19 Defendant,

20 and

21 JOSHUA HINDS,

22 Third-Party Claimant.

23
 24 The United States and Third-Party Claimant Joshua Hinds present the following
 25 Stipulation and proposed Order to settle Mr. Hinds' asserted interest in one Ruger
 26 Security-9 pistol, bearing serial number 383-03286, with a loaded magazine attached, and
 27 two additional loaded magazines (hereinafter, the "Ruger/Magazines") that were forfeited
 by Defendant Ryan Holmquist in this case.28
 I. BACKGROUND29
 30 Defendant Ryan Holmquist agreed to forfeit his interests in the Ruger/Magazines
 31 as well as three boxes of ammunition and miscellaneous loose rounds of ammunition (the
 32 "Ammunition"), pursuant to the plea agreement he entered on July 5, 2025. Dkt. No. 267.

1 Prior to Defendant's sentencing, the Court entered a Preliminary Order of Forfeiture
 2 forfeiting Defendant's interest in the Ruger/Magazines and the Ammunition. Dkt. No.
 3 328. As required by 21 U.S.C. § 853(n)(1) and Fed. R. Crim. P. 32.2(b)(6)(C), the United
 4 States published notice of the Preliminary Order of Forfeiture and its intent to dispose of
 5 the Ruger/Magazines and Ammunition in accordance with governing law. Dkt. No. 367.
 6 That notice informed any third parties claiming an interest in the Ruger/Magazines or the
 7 Ammunition that they were required to file a petition with the Court within 60 days of the
 8 date of the notice's first publication on September 25, 2024. *Id.*

9 As required by Fed. R. Crim. P. 32.2(b)(6)(A), the United States sent notice and a
 10 copy of the Preliminary Order of Forfeiture to Joshua Hinds, as he appeared to be a
 11 potential claimant to the Ruger/Ammunition based on the underlying investigative
 12 materials. *See* Declaration of Assistant United States Attorney Karyn S. Johnson in
 13 Support of Motion for Final Order of Forfeiture ("Johnson Decl.") (Dkt. No. 456), ¶ 4
 14 and Exhibit B. The United States also sent notice of the pending forfeitures to an
 15 individual with the initials A.H. and to American Family Insurance. *Id.*, ¶ 4 and Exhibits
 16 A and C. The last of the mailed notice letters was delivered on or about April 21, 2025.
 17 *Id.*

18 Mr. Hinds filed a claim to the Ruger/Magazines, in which he asserted he is the
 19 rightful owner of this property. *See* Dkt. No. 422. In his claim, Mr. Hinds advised that the
 20 property had been stolen from him. *Id.*

21 No competing claims to the Ruger/Magazines have been filed, and the period for
 22 doing so expired on or about November 24, 2024, for the published notice, and May 21,
 23 2025, for direct notice.

24 **II. STIPULATION**

25 The United States and Mr. Hinds HEREBY STIPULATE to the following:
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1 1. In support of his Claim, Mr. Hinds asserts that he is the rightful owner of
 2 the Ruger/Magazines. Mr. Hinds provided documentation showing that he had purchased
 3 for the Ruger/Magazines on or about March 13, 2020, from Spectyr Industries.

4 2. The information provided by Mr. Hinds is consistent with information
 5 contained in the firearms trace report for the Ruger/Magazines (“Tracing Report”)
 6 prepared by the United States Department of Justice, Bureau of Alcohol, Tobacco,
 7 Firearms and Explosives (“ATF”). The Tracing Report confirms that Mr. Hinds was the
 8 last individual to purchase the Ruger/Magazines from a Federal Firearms Licensee
 9 (“FFL”) and further confirms that Mr. Hinds purchased the Ruger/Magazines from
 10 Spectyr Industries Corp. (“SIC”), a FFL, in 2020.

11 3. Mr. Hinds asserts that in June of 2022, he reported the theft of the
 12 Ruger/Magazines to the King County Sheriff’s Office and provided a case number,
 13 C22017037. Mr. Hinds asserts that he submitted a claim to his insurance company,
 14 American Family Insurance, regarding the theft of this property, however, his insurance
 15 company did not provide any compensation for the claim. Mr. Hinds provided
 16 documentation showing that he submitted the claim.

17 4. Mr. Hinds asserts that he does not know the Defendant or how Defendant
 18 acquired the Ruger/Magazines.

19 5. The Federal Bureau of Investigation has confirmed that Mr. Hinds has no
 20 identifiable criminal history precluding him from possession a firearm at this time.

21 6. Mr. Hinds affirms that neither he nor any person living in his residence is
 22 prohibited from possessing a firearm.

23 7. Based on the information and affirmations reflected in Paragraphs 1–6,
 24 above, the United States agrees that Mr. Hinds had a vested interest in the
 25 Ruger/Magazines, pursuant to 21 U.S.C. § 853(n)(6)(A), before Defendant Ryan
 26 Holmquist possessed them.

1 8. The United States recognizes Mr. Hinds' vested interest in the
2 Ruger/Magazines and agrees to release this property to Mr. Hinds following the criminal
3 proceedings in this case, to include any criminal appeal. The seizing agency, FBI, will
4 affect the return of the Ruger/Magazines to Mr. Hinds.

5 9. Mr. Hinds understands the Ruger/Magazines constitute evidence in this
6 case and cannot be returned prior to the completion of these criminal proceedings, to
7 include any criminal appeal.

8 10. Mr. Hinds understands and agrees the Ruger/Magazines will be returned to
9 him in their current condition, as they were seized from Defendant in this case.

10 11. Mr. Hinds understands and agrees that this Stipulation fully and finally
11 resolves his claim to the Ruger/Magazines. Mr. Hinds waives any right to further litigate
12 or pursue his claim, in this or any other proceeding, judicial or administrative.

13 12. Upon return of the Ruger/Magazines, Mr. Hinds agrees to release and hold
14 harmless the United States, its agents, representatives, and/or employees, as well as any
15 involved state or local law enforcement agencies, their agents, representatives, and/or
16 employees, from any and all claims Mr. Hinds may possess, or that could arise, based on
17 the seizure, detention, and return of the Ruger/Magazines.

18 13. The United States and Mr. Hinds agree they will each bear their own costs
19 and attorneys' fees associated with the seizure, detention, and return of Ruger/Magazines,
20 as well as with Mr. Hinds' claim and this Stipulation.

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1 14. The United States and Mr. Hinds agree that the terms of this Stipulation are
2 subject to review and approval by the Court, as provided in the proposed Order below. If
3 the Court enters the proposed Order, a violation of any term or condition of this
4 Stipulation shall be construed to be a violation of that Order.

Respectfully submitted,

TEAL LUTHY MILLER
Acting United States Attorney

DATED: June 12, 2025

s/ Karyn S. Johnson

KARYN S. JOHNSON

Assistant United States Attorney

United States Attorney's Office

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DATED: June 11, 2025

s/Joshua Hinds

JOSHUA HINDS*

Third-Party Claimant

Duvall, WA

**Signed by AUSA Johnson on behalf of
Joshua Hinds per email authorization on
June 11, 2025*

[PROPOSED] ORDER

The Court has reviewed the above Stipulation between the United States and Third-Party Claimant Joshua Hinds, settling the interest Mr. Hinds has asserted in the Ruger/Magazines, Dkt. No. 422, that were forfeited by Defendant Ryan Holmquist in this case, Dkt. No. 328.

The Court HEREBY APPROVES the Stipulation and Settlement and its terms.

IT IS SO ORDERED.

DATED this 16th day of June, 2025.

Lauren King
THE HON. LAUREN KING
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2025, I electronically filed the foregoing Stipulation and Proposed Order Settling Third-Party Claim to Firearm with the Clerk of the Court using the CM/ECF system, which sends notice of the filing to all ECF participants of record.

I hereby further certify that on June 12, 2025, I served the foregoing Notice on the following parties who are not participating in ECF, at the addresses listed below, by U.S. First Class Mail and/or by electronic mail, as indicated:

Joshua Hinds
[REDACTED]
Duvall, WA 98019
[REDACTED]@gmail.com

s/Hannah G. Williams
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